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Attorney for Defendant
MARIA ESCAMILLA LOPEZ

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

JOSE ENCARNACION MAYO RODRIGUEZ,
SYLVIA ZAMBRANO, YESENIA LOPEZ,
MARIA LUISA ESCAMILLA LOPEZ, JUAN
CHAVARRIA, JUAN RAMON LOPEZ,
NEREYDA ALVAREZ, PHILLIP ALLEN
BAILEY, and CHARLES JAMES
BILLINGSLEY,
Defendants.

Case No.: 2:19-cr-231 WBS

STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE TO
JANUARY 25, 2021 AT 9:00 A.M., AND
EXCLUDING TIME UNDER THE SPEEDY
TRIAL ACT

Date: October 19, 2020
Time: 9:00 a.m.
Court: Hon. William B. Shubb

This is a case charging conspiracy to distribute methamphetamine and heroin. It is presently set for status conference involving all nine defendants on October 19, 2020. The government has provided voluminous discovery consisting of over 23 GB of materials. A substantial amount of the recordings are in Spanish and will need to be translated.

ORDER CONTINUING STATUS
CONFERENCE

1 Many of the events at issue in the case occurred in San Joaquin County, with additional
2 matters occurring in Southern California and the San Francisco Bay Area. Defense investigation
3 into the charged events can fairly be characterized as state-wide in scope. Additional time is
4 required for defense investigation into matters charged in the Indictment.
5

6 The parties to this action, Plaintiff United States of America by and through Assistant
7 United States Attorney David Spencer, and Attorney Todd Leras on behalf of Defendant Jose
8 Mayo Rodriguez, Attorney Christopher Cosca on behalf of Defendant Sylvia Zambrano,
9 Attorney Brian Andritch on behalf of Defendant Yesenia Lopez, Attorney Dina Santos on behalf
10 of Defendant Maria Escamilla Lopez, Attorney Armando Villapueda on behalf of Defendant
11 Juan Chavarria, Attorney Philip Cozens on behalf of Defendant Juan Lopez, Attorney David
12 Garland on behalf of Defendant Nereyda Alvarez, Attorney Michael Chastaine on behalf of
13 Defendant Phillip Bailey, and Attorney Johnny Griffin, III, on behalf of Defendant Charles
14 Billingsley, stipulate as follows:
15

- 16 1. By this stipulation, Defendants now move to vacate the status conference presently
17 set for October 19, 2020. The parties request to continue the status conference to
18 January 25, 2021, at 9:00 a.m., and to exclude time between October 19, 2020, and
19 January 25, 2021, inclusive, under Local Code T-4. The United States does not
20 oppose this request.
21
- 22 2. Based on the above-stated facts regarding the volume of discovery and the time
23 required for defense investigation, the parties jointly request that the Court find that
24 the ends of justice served by continuing the case as requested outweigh the best
25 interest of the public and the Defendants in a trial within the time prescribed by the
26
27

28 ORDER CONTINUING STATUS
CONFERENCE

Speedy Trial Act.

3. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of October 19, 2020 to January 25, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and (B) (iv) [Local Code T-4] because it results from a continuance granted by the Court at Defendants' request on the basis that the ends of justice served by taking such action outweigh the best interest of the public and the Defendants in a speedy trial.
4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Assistant U.S. Attorney David Spencer and all defense counsel have agreed to this proposed order and authorized Dina Santos to sign it via email on their behalf.

DATED: October 12, 2020

By /s/ Dina Santos for
DAVID SPENCER
Assistant United States Attorney

DATED: October 12, 2020

By /s/ Dina Santos for
TODD D. LERAS
Attorney for Defendant
JOSE MAYO RODRIGUEZ

DATED: October 12, 2020

By /s/ Dina Santos for
CHRISTOPHER R. COSCA
Attorney for Defendant
SYLVIA ZAMBRANO

ORDER CONTINUING STATUS
CONFERENCE

DATED: October 12, 2020

By /s/ Dina Santos for
BRIAN ANDRITCH
Attorney for Defendant
YESENIA LOPEZ

DATED: October 12, 2020

By /s/ Dina Santos
DINA L. SANTOS
Attorney for Defendant
MARIA ESCAMILLA LOPEZ

DATED: October 12, 2020

By /s/ Dina Santos for
ARMANDO VILLAPUEDA
Attorney for Defendant
JUAN CHAVARRIA

DATED: October 12, 2020

By /s/ Dina Santos for
PHILIP COZENS
Attorney for Defendant
JUAN RAMON LOPEZ

DATED: October 12, 2020

By /s/ Dina Santos for
DAVID GARLAND
Attorney for Defendant
NEREYDA ALVAREZ

DATED: October 12, 2020

By /s/ Dina Santos for
MICHAEL CHASTAINE
Attorney for Defendant
PHILLIP BAILEY

DATED: October 12, 2020

By /s/ Dina Santos for
JOHNNY GRIFFIN, III
Attorney for Defendant
CHARLES BILLINGSLEY


ORDER CONTINUING STATUS
CONFERENCE

ORDER

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for October 19, 2020, is vacated. A new status conference is scheduled for January 25, 2021, at 9:00 a.m. The Court further finds, based on the representations of the parties and Defendants' request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendants in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from October 18, 2020, up to and including January 25, 2021.

IT IS SO ORDERED.

Dated: October 13, 2020


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE

ORDER CONTINUING STATUS
CONFERENCE